



November 10, 2021

SFY 2022 – DBH Guidance Document #5

Guidance Document for Agencies using AKAIMS for Electronic Health Record Expiration of AKAIMS Flexibilities Related to Cyberattack

Background

On May 18, 2021, the Department of Health and Social Services (DHSS) identified the website dhss.alaska.gov as the target of a malware attack. As a result, several Division of Behavioral Health services were impacted, including Alaska's Behavioral Health and Substance Abuse Management System (AKAIMS).

AKAIMS Electronic Health Record (EHR) users were initially notified of the cyberattack on May 19, 2021, via DBH eMemo.

As a result of the cyberattack, DHSS had to restrict user access to public facing applications and AKAIMS EHR users were required to revert to paper documentation systems to maintain business operations. This resulted in cumbersome workflows and difficulty in managing quality assurance functions.

The Division of Behavioral Health (DBH) issued SFY 2022 Guidance Document 2 – CORRECTED to advise AKAIMS EHR users of flexibilities DBH is extending to assist in reducing the administrative burden the AKAIMS outage created.

On November 5, 2021, DBH issued an AKAIMS update announcing AKAIMS had reached the final user acceptance testing (UAT) phase and was publicly available for any agency wishing to begin testing. Additionally, the notice informed providers that AKAIMS would formally "Go Live" on Monday, November 15, 2021.

Purpose

The purpose of this guidance document is to provide notification that the flexibilities extended during the AKAIMS outage are ending November 15, 2021.

Guidance

The hold harmless period for specific regulatory clinical documentation requirements extended to AKAIMS EHR users is ending Monday, November 15, 2021. Specifically, providers will be expected to resume adherence to the provisions listed below on November 15, 2021:

- The behavioral health screening as defined in 7 AAC 135.100 is required to be dated prior to the assessment signature date and the behavioral health screening must be incorporated into any assessments used to develop a treatment plan.
- Professional behavioral health assessments as defined in 7 AAC 135.110 are required to have a final signature prior to the development of the treatment plan or provision of behavioral health services.
- The behavioral health treatment plan as defined in 7 AAC 135.120 requires a finalized assessment with appropriate signatures as defined by regulation. The agency is responsible to ensure the services are delivered at an adequate skill level as defined in 7 AAC 135.120 (b)(2).
- The requirement for review of a treatment plan every 90 days, as defined in 7 AAC 135.120 (f) is reinstated. The agency is responsible to ensure an active treatment plan that meets the requirements of 7 AAC 135.120 is in place on November 15, 2021, to bill Alaska Medicaid.
- Services may not be delivered without a finalized treatment plan on or after November 15, 2021.
- Contemporaneous Record Keeping according to 7 AAC 105.230 (d)(7) and 7 AAC 105.230 (h) is again required beginning November 15, 2021.

Questions regarding this guidance may be directed to mpassunit@alaska.gov. In the Subject Line please note: Expiration of AKAIMS EHR Flexibilities